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**E-mails Re Discovery**

3 messages

**Anthony Paronich** <anthony@paronichlaw.com>

Wed, May 7, 2025 at 5:39 PM

To: "Jobe, Jason" <jjobe@hompsoncoecoe.com>, "Patel, Yesha" <YPatel@thompsoncoecoe.com>  
Cc: Andrew Perrong <a@perronglaw.com>

Can you please confirm you are receiving my meet and confer e-mails? We're getting attachment alert notifications from your e-mail addresses.

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Anthony Paronich  
Paronich Law, P.C.  
350 Lincoln Street, Suite 2400  
Hingham, MA 02043  
[o] (617) 485-0018  
[c] (508) 221-1510  
[f] (508) 318-8100

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**Patel, Yesha** <YPatel@hompsoncoecoe.com>

To: Anthony Paronich <anthony@paronichlaw.com>, "Jobe, Jason" <jjobe@hompsoncoecoe.com>  
Cc: Andrew Perrong <a@perronglaw.com>

Anthony,

My understanding is that you are getting alert notifications because you have a file attached which the firm's security system does not allow. However, I received your email from yesterday.

Our position is that we do not believe you can conduct discovery directed to absent class members. Further, class has not been certified yet, so we do not believe you are entitled to the obtainable. Thus, the redactions on the sheets we produced.

As for Plaintiff's deposition, please send us the dates. We do not believe the redaction issue bears a correlation on whether we can depose plaintiff on his claims.

I will look at the interrogatory you pointed out in the email, discuss it with client to make sure nothing has changed since we last spoke, and get back to you by mid next week.

Thanks,  
Yesha

**THOMPSON  
COE** | Yesha Patel • Partner  
700 North Pearl Street, 25th Floor, Dallas, TX 75201  
o: 214-880-2769  
bio • vCard • web

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**Anthony Paronich** <anthony@paronichlaw.com>

To: Yesha Patel <YPatel@hompsoncoecoe.com>

Cc: Jason Jobe <jjobe@thompsoncoecoe.com>, Andrew Perrong <a@perronglaw.com>

We are going to move to compel the unredacted call logs.

The Plaintiff, whose deposition you previously cancelled, is currently available via Zoom on June 13.

On May 8, 2025, at 9:44 PM, Patel, Yesha <YPatel@thompsoncoecoe.com> wrote:

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Thanks,  
Yesha

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**From:** Anthony Paronich <anthony@paronichlaw.com>

**Sent:** Wednesday, May 7, 2025 4:39 PM

**To:** Jobe, Jason <jjobe@thompsoncoecoe.com>; Patel, Yesha <YPatel@thompsoncoecoe.com>



Yesma Patel • Partner  
700 North Pearl Street, 25th Floor, Dallas, TX 75201  
o: 214-880-2769  
[bio](#) • [vCard](#) • [web](#)

Cc: Andrew Perrong <[a@perronglaw.com](mailto:a@perronglaw.com)>

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